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August 31, 2022

VIA ECF

Hon. Vera M. Scanlon, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Adolphe v. MJ-MC Home Health Care Agency Inc.*, Docket No. 2:19-cv-01510

Dear Judge Scanlon:

This firm is counsel to Plaintiff Fridane Adolphe in the above referenced wage and hour class action. Pursuant to Your Honor's Order issued on June 14, 2022, I write jointly with Defendant to update the Court on the status of the *Abdujamilova v. MJ-MC Home Health Care Agency, Inc.*, Index No. 522586/2016 (N.Y. Sup. Ct. Kings Co.) and *Sanchez v. MJ-MC Home Health Care Agency, Inc.*, Index No. 160461/2018 (N.Y. Sup. Ct. N.Y. Co.).¹

On August 15, 2022, the Honorable James E. D'Auguste, J.S.C granted Plaintiffs' motion for class certification and signed Plaintiffs' proposed publication order setting forth the schedule for Plaintiffs to publish notice of the state court class action to class members.² In accordance with the New York Civil Practice and Rules, Plaintiffs filed a notice of entry for both orders on August 15, 2022, thus, Defendants time to appeal expires on September 14, 2022. Defendants are also required to provide Plaintiffs with the class member list on or before September 14, 2022 so that Plaintiffs can publish the class notice on or before October 5, 2022. Given these impending deadlines, the parties respectfully request that this matter continue to be stayed until Defendants time to appeal and to provide the class member list has expired.

Respectfully submitted,
/s/ LaDonna M. Lusher

cc: All counsel of record. (via ECF)

¹ Defendant is represented by Littler Mendelson, P.C. in this federal action, and by Bond, Schoeneck & King, PLLC in the state actions.

² The class certification order and publication order are attached hereto.